

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	
INTEGRATED HEALTH SERVICES, INC.,	)	Case No. 00-389 (MFW)
<i>et al.</i> ,	)	Jointly Administered
Debtors.	)	
_____	)	
	)	
IHS LIQUIDATING LLC,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 05-376 (GMS)
	)	
ACE INDEMNITY INSURANCE COMPANY	)	
f/k/a INDEMNITY INSURANCE COMPANY	)	
OF NORTH AMERICA,	)	
	)	
Defendant.	)	
_____	)	
IHS LIQUIDATING LLC,	)	Civil Action No. 04-1262 (GMS)
	)	
Third Party Plaintiff,	)	
v.	)	
	)	
NATIONAL UNION FIRE INSURANCE	)	
COMPANY OF PITTSBURGH, PA,	)	
GENERAL STAR INDEMNITY COMPANY	)	
and ACE INDEMNITY INSURANCE	)	
COMPANY f/k/a INDEMNITY INSURANCE	)	
COMPANY OF NORTH AMERICA	)	
	)	
Third-Party Defendants.	)	
_____	)	
ACE INDEMNITY INSURANCE COMPANY	)	
f/k/a INDEMNITY INSURANCE COMPANY	)	
OF NORTH AMERICA,	)	
	)	
Third-Party Defendant and	)	
Fourth-Party Plaintiff,	)	
v.	)	
	)	
NATIONAL UNION FIRE INSURANCE	)	
COMPANY OF PITTSBURGH, PA, and	)	
GENERAL STAR INDEMNITY COMPANY,	)	
	)	
Fourth-Party Defendants.	)	
_____	)	

**MOTION FOR SUMMARY JUDGMENT  
OF CROSS-CLAIM DEFENDANT NATIONAL UNION  
FIRE INSURANCE COMPANY OF PITTSBURGH, PA**

National Union Fire Insurance Company of Pittsburgh, PA (“National Union”), by and through undersigned counsel, hereby files its motion for summary judgment pursuant to Fed. R. Civ. P. 56 (the “Motion”). In support of the Motion, National Union hereby adopts, and incorporates by reference, its opening brief in support of its motion for summary judgment, filed contemporaneously herewith.

Dated: June 25, 2007  
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon  
Christopher Page Simon (No. 3697)  
913 N. Market Street, 11th Floor  
P.O. Box 1380  
Wilmington, Delaware 19801  
Telephone: (302) 777-4200  
Facsimile: (302) 777-4224

-and-

George C. Campion, Esquire  
Weiner Lesniak, LLP  
629 Parsippany Road  
Parsippany, NJ 07054-0438  
Telephone: (973) 403-1100  
Facsimile: (973) 403-0010

-and-

Gwynne A. Young  
Florida Bar No. 185582  
Frederick T. Hawkes  
Florida Bar No. 307629  
Carlton Fields, PA  
P.O. Drawer 190  
Tallahassee, FL 32302  
Phone: (850) 224-1585  
Facsimile: (850) 222-0398

Counsel for Cross-Claim Defendant  
National Union Fire Insurance Co. of  
Pittsburgh, PA